

Archer&Greiner P.C.
ATTORNEYS AT LAW

Steven B. Harz
*Member of New Jersey and New York
Bars*
sharz@archerlaw.com

Court Plaza South, West Wing
21 Main Street, Suite 353
Hackensack, NJ 07601-7095
201- 342-6000 Main
201- 342-6611 Fax
www.archerlaw.com

May 14, 2014

Via ECF

Hon. Madeline Cox Arleo, U.S.M.J.
U.S. District Court for the District of New
Jersey
M.L. King Jr. Federal Bldg. & U.S.
Courthouse, Room 2060
50 Walnut Street
Newark, NJ 07101

Re: Isabel Perez v. Factory Direct of Secaucus, LLC d/b/a Ashley Furniture HomeStore,
Eugene Chrinian, and Kathy Martin
Case Number: 2:13-cv-00327-SDW-MCA

Dear Judge Arleo:

As your Honor is aware, we represent Defendants Factory Direct of Secaucus, LLC d/b/a Ashley Furniture HomeStore ("Ashley Furniture"), Eugene Chrinian, and Kathy Martin (collectively, "Defendants"). We regret having to revisit this issue but are compelled to very briefly reply to the letter submitted by Plaintiff's counsel earlier this afternoon.

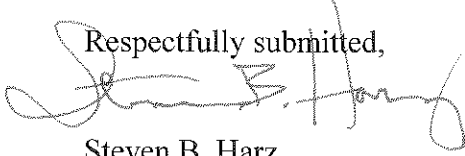
Notwithstanding counsel's flippant characterization of travel to midtown Manhattan from New Jersey, anyone who has made the trip is aware of the constant traffic and time issues that arise, as well as the unreasonable expense of tolls and parking. Plaintiff's counsel had provided no good reason why Mr. Scott should be subjected to such burden and expense. Counsel's alleged desire to have access to his "complete case file" and support staff was not an issue at any of the six (6) other depositions that have taken place in this matter, all at our Hackensack, New Jersey office. As such, Defendants' position remains as detailed in my letter of May 13, 2014 [DE 50].

Your Honor's attention to this matter is appreciated.

Hon. Madeline Cox Arleo, U.S.M.J.

May 14, 2014

Page 2

Respectfully submitted,

Steven B. Harz

SBH:dcr

Ariel Y. Graff, Esq. (via ECF)

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